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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

LFP IP, LLC,

Plaintiff,

vs.

LEE KEITH BRETT,

Defendant.

Case No.: 2:16-cv-00166-FMO-RAO

**NOTICE OF JOINT MOTIONS
FOR SUMMARY JUDGMENT**

Date: May 18, 2017
Time: 10:00 a.m.
Place: Courtroom 6D

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on May 18, 2017 at 10:00 a.m., or as soon thereafter as counsel may be heard, in Courtroom 6D of the above-identified Court, located at 350 W. 1st Street, 6th Floor, Los Angeles, CA 90012, Plaintiff LFP IP, LLC will and hereby does move for Summary Judgment, or Partial Summary Judgment, in favor of Plaintiff pursuant to Rule 56(c) of the Federal Rules of Civil Procedure on Plaintiff's:

- (1) Count I - Federal Trademark Infringement (Registered Mark);
- (2) Count II – Federal Unfair Competition – False Designation of Origin; and
- (3) Count IV – Violation of the Anticybersquatting Consumer Protection Act.

Defendant Brett seeks:

- (1) Summary Judgment on his contention that: "LFP'S HUSTLER® marks are NOT famous and widely recognized by the general consuming public of the United States";
- (2) Summary Judgment on his contention that: "Plaintiff's HUSTLER® marks are NOT well-known by the general consuming public of the United States."
- (3) Motion to dismiss on his contention that "Hustler is a generic word."

1 This motion is made following the conference of counsel for Plaintiff LFP IP,
2 LLC and Pro Se Defendant Lee Keith Brett pursuant to L.R. 7-3 which took place
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4 on multiple dates and times before the filing of this motion.

5 Dated: April 20, 2017
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7 MARK S. HOFFMAN, A
8 PROFESSIONAL CORPORATION

9 LIPSITZ GREEN SCIME CAMBRIA LLP
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12 By: /s/ Jonathan W. Brown
13 Jonathan W. Brown, Esq.
14 Attorneys for Plaintiff LFP IP, LLC
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